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January 7, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

RE: Docket No. 94P -0036; Food Labeling:
Trans Fatty Acids

Dear Sir or Madam:

The National Association of Margarine Manufacturers (NAMM) is the association representing United States manufacturers of margarines and vegetable oil spreads. NAMM respectfully requests an extension of 90 days for the deadline for comment on the above noted regulatory proposal.

The proposal, published on November 17, 1999, is extensive and rich in detail and discussion. Many of the provisions proposed are of major importance to our members and the consumers they serve. Additionally, a considerable part of the rationale provided to support the proposal, as well as the expressed goals of the proposal's intended effect, speak specifically to the margarine category.

The margarine industry has been working diligently to reduce the level of trans fats in its products over the past decade and has made remarkable progress. Manufacturers want to assure that incentives remain in place for continuing this resource intensive effort. Careful consideration of all details of the proposal is, therefore, important. We also note that many margarine producers are engaged in processing foods in a variety of other categories that are affected by this proposal. It is necessary for them to coordinate the consideration of the proposal's ramifications for all of their products and all of their consumers.

The intervening holiday period occurring just after publication of the proposal has slowed this entire process. Thus, our member companies need additional time to formulate their respective positions. And, finally the association requires some additional time to resolve member differences in order to present FDA with a consensus position for the margarine industry.

Therefore, we strongly urge the FDA's to grant an extension for 90 days beyond the current deadline of February 15, 2000. Thank you for your consideration.

Sincerely,

Richard E. Cristol
President

CC: Virginia Wilkening, Center for Food Safety and Applied Nutrition

94P-0036

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